

United States District Court

Western District of Tennessee

RECEIVED

David Chester Faulkner

v. Plaintiff

Henry Stewart et. Al;

Defendants

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WD OF TN, MEMPHIS

CASE # 2-10-CV-02722-JDT-dkr

JULY TRIAL DEMAND

Motion To File Supplemental
Complaint

Comes now the Plaintiff in the above styled case and asks that the Court grant him leave to supplement his complaint. New evidence has come into the Plaintiff's awareness by reviewing his Institutional and Medical Files at the Morgan County Correctional Complex.

On November 25th, 2009 Plaintiff was severely beaten by the Defendants in this case LT Mullins, Cpl. Sonderman, Cpl McClain, Cpl Webb, and Cpl Patten, upon the orders of Warden Stewart and Warden Mills.

Plaintiff now knows from the attached "Exhibit A" that Nurse Cindy Johnson and Nurse Hope Smith participated in the violation of Plaintiff's Eighth Amendment rights by denial of medical treatment and deliberate indifference to his serious medical needs.

In violation of Plaintiff's Eighth Amendment Rights.

Nurses Johnson and Smith ordered that the Plaintiff was "OK" and could be left in the floor, hog tied in restraints even though it was plainly aware that Plaintiff has a dislocated shoulder, numerous fractures of the face, and a loss of consciousness.

In Exhibit B (Attached) Nurse Johnson states "Release to Security to place in Security Restraints"

In Exhibit C (Attached) it becomes obvious that Nurse Johnson and Nurse Smith were negligent in their care of Plaintiff when Doctor Frederick Cole MD orders the Plaintiff sent to Lauderdale Hospital for "Probable Dislocation of (R) Humerus, Possible (R) Facial Fracture"

In conclusion, Nurse Cindy Johnson and Nurse Hope Smith were aware that Plaintiff was severely injured, yet they choose to go along with the other Defendants in this case and inflict cruel and unusual punishment upon the Plaintiff. Plaintiff request that this Court ORDER

(3)

that this supplemental complaint can be added
to this Action, and that Nurse Cindy Johnson
and Hope Smith be served process.

This 7th day of August, 2011

David Faulkner
Pro se Plaintiff